IN THE UNITED STATES FEDERAL DISTRICT COURT MIDDLE DISTRICT OF ALABAMA NORTHERN DIVISION

UNITED STATES OF AMERICA,

* Plaintiff,

CR. NO. 2:06cr-169-WHA VS.

CLIFF JOHNSON

Defendant.

CLIFF JOHNSON'S MOTION FOR REIMBURSEMENT OF COPY EXPENSE

COMES, James R. Cooper, Jr. who on behalf of his indigent client Cliff Johnson, does move to be reimbursed for the costs of copying Discovery and further states as follows:

- 1. Discovery is voluminous. Mr. Cooper got copied 7428 pages of paper discovery. After review, he may need to get additional discovery.
- 2. The government would not pay for this discovery. It had to be purchased at Pro Legal Copies of Montgomery, Inc. at the expense of the defendant's attorney in the amount of \$ 408.54. (A hard copy of this Motion and the bill for \$ 408.54 from Pro Legal will be filed with the Clerk)
- 3. Normal reimbursement takes too long. Neither Mr. Johnson nor Mr. Cooper can afford to pay for this discovery out of their pockets. The government should be made to pay.

Wherefore Mr. Johnson requests that he be granted an Order allowing his attorney to be reimbursed \$ 408.54 for copying expenses to date and all other appropriate relief.

RESPECTFULLY SUBMITTED,

/s/ James R. Cooper, Jr. James R. Cooper, Jr. (COO021) COOPER & COOPER 312 Scott Street Montgomery, Alabama 36104

(334) 262-4887 (334) 262-4880 (Facsimile)

CERTIFICATE OF SERVICE

I hereby certify that on this the 11th day of April, 2007, I have served a copy of the foregoing Motion for Reimbursement Upon Ms. Clark Morris, AUSA, at the last known address of: P.O. Box 197, Montgomery, Al By placing a copy of the same in the United States Mail properly addressed and postage prepaid and electronically.

> /s/James R. Cooper, Jr. JAMES R. COOPER, JR.

Cc: Cliff Johnson Montgomery City Jail P. O. Drawer 159 Montgomery, AL 36104